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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re:
DEBTOR CORPORATION**

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**RESPONSE OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
TO MOTION OF DEBTORS
PURSUANT TO 11 U.S.C. §§ 105(a) AND
363 FOR AN ORDER AUTHORIZING
DEBTORS TO PARTICIPATE IN AB-
1054 WILDFIRE FUND (THE
“WILDFIRE FUND MOTION”) (DKT.
NO. 3444)**

Date: August 28, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom: 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: August 22, 2019

1 The Official Committee of Tort Claimants (“**TCC**”) does not oppose the election by PG&E
2 Corporation (“**Holdco**”) and Pacific Gas and Electric Company (“**Utility**,” and together with
3 Holdco, the “**Debtors**”) to participate in the Wildfire Fund to be established pursuant to AB 1054,
4 or the Court’s approval, by September 10, 2019, of that participation.

5 While the TCC does not object to the specific relief requested by the Debtors, the TCC does
6 not believe that this Court’s discretion in administering these bankruptcy cases can or should be
7 directed or impacted by provisions of AB 1054 that purport to preclude the Debtors from
8 participating in the Wildfire Fund unless the Debtors confirm a reorganization plan that meets
9 certain requirements within a certain time frame (i.e., by June 30, 2020). Specifically, the TCC
10 respectfully submits that this Court must adopt procedures for the estimation or liquidation of
11 Northern California Wildfire claims that provide due process for claimants without regard to the
12 provisions of AB 1054 that attempt to impose a June 30, 2020 deadline on resolution of these
13 bankruptcy cases to access the Wildfire Fund.

14 The TCC’s failure to object to the relief requested by the Debtors does not waive, and the
15 TCC expressly reserves, the TCC’s right to challenge any aspect of the administration of these
16 bankruptcy cases including on the grounds that the Court’s administration of these bankruptcy cases
17 denies procedural and substantive due process to the Northern California Wildfire claimants or on
18 the grounds that state law is preempted by federal bankruptcy laws.

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20 Dated: August 22, 2019

Respectfully submitted,

21 BAKER & HOSTETLER LLP

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23 By: /s/ Cecily A. Dumas
Cecily A. Dumas

24 *Counsel for Official Committee of Tort Claimants*
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